



**Service of Process
Transmittal**

02/14/2018

CT Log Number 532798803

TO: Kim Lundy Service of Process, Legal Support Supervisor
Walmart Inc.
702 SW 8th St, MS#0215
Bentonville, AR 72716-6209

RE: Process Served in Georgia

FOR: Wal-Mart Stores, Inc. (Former Name) (Domestic State: DE)
Walmart Inc. (True Name)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Wright Dianne, Pltf. vs. Wal-Mart Stores, Inc., Dft.

DOCUMENT(S) SERVED: Entry, Summons, Form, Complaint, Interrogatories, First Request(s)

COURT/AGENCY: Douglas County State Court, GA
Case # 18SV00047

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition - 11/06/2016 - Walmart Supercenter Store located at 1100 Thorton Road, Lithia Springs, Georgia 30122

ON WHOM PROCESS WAS SERVED: C T Corporation System, Lawrenceville, GA

DATE AND HOUR OF SERVICE: By Process Server on 02/14/2018 at 10:21

JURISDICTION SERVED : Georgia

APPEARANCE OR ANSWER DUE: Within 30 days after service, exclusive of the day of service (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): Surieisha L. Williams
S. Williams Law Firm, PLLC
P.O. Box 52421
Atlanta, GA 30355
404-490-3740

ACTION ITEMS: CT has retained the current log, Retain Date: 02/15/2018, Expected Purge Date: 02/20/2018

Image SOP

Email Notification, Kim Lundy Service of Process ctlawsuits@walmartlegal.com

SIGNED:
ADDRESS: C T Corporation System
289 S Culver St.
Lawrenceville, GA 30046-4805
TELEPHONE: 866-286-4469

Page 1 of 1 / DV

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

Exhibit B

77154

SHERIFF'S ENTRY OF SERVICECivil Action No. 18SV00047

Superior Court ☐ Magistrate Court ☐
 State Court ☒ Probate Court ☐
 Juvenile Court ☐

Date Filed 02/07/2018Georgia, Douglas COUNTY

Attorney's Address

S. Williams Law Firm, LLCP.O. Box 52421Atlanta, GA 30355

Name and Address of Party to Served

C T Corporation System (Wal-Mart Stores)289 S Culver StLawrenceville, GA 30046-4805Dianne Wright

Plaintiff

VS.

Wal-Mart Stores, Inc.

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE**PERSONAL**

I have this day served the defendant _____ personally with a copy
☐ of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a
 copy of the action and summons at his most notorious place abode in this County.

☐ Delivered same into hands of _____ described as follows:
 age, about _____ years; weight _____ pounds; height _____ feet and _____ inches, domiciled at the residence of
 defendant.

CORPORATION

Served the defendant Wal-Mart Stores, Inc. a corporation

☒ by leaving a copy of the within action and summons with Wal-Mart Stores, Inc.
 In charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises
 designated in said affidavit and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an
☐ envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice
 to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

Diligent search made and defendant _____
☐ not to be found in the jurisdiction of this Court.

This 07 day of FEB, 2018

DEPUTY

18SV00047

**IN THE STATE COURT OF DOUGLAS COUNTY
STATE OF GEORGIA**

DIANNE WRIGHT,

Plaintiff,

vs.

WAL-MART STORES, INC.,

Defendant.

Civil Action File No. 18SV00047

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Suneisha L. Williams, Esq.
S. Williams Law Firm, LLC
P.O. Box 52421
Atlanta, GA 30355

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for relief demanded in the complaint.

This the 7th day of February, 2018.

Douglas County Clerk of State Court

By: /s/ Tammy M. Howard
Deputy Clerk

General Civil and Domestic Relations Case Filing Information Form

18SV00047

☒ Superior or ☐ State Court of Douglas County County

[illegible]

Plaintiff(s)

Wright, Dianne

Last	First	Middle I.	Suffix	Prefix
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Last	First	Middle I.	Suffix	Prefix
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Last	First	Middle I.	Suffix	Prefix
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Last	First	Middle I.	Suffix	Prefix
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Defendant(s)

Wal-Mart Stores, Inc.

Last	First	Middle I.	Suffix	Prefix
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Last	First	Middle I.	Suffix	Prefix
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Last	First	Middle L.	Suffix	Prefix
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Last	First	Middle I.	Suffix	Prefix
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Plaintiff's Attorney Suneisha L. Williams

Bar Number 417632

Self-Represented ☐

Check One Case Type in One Box

- ☐ General Tort Cases
- ☐ Automobile Tort
- ☐ Debt Appeal
- ☐ Contract
- ☐ Garnishment
- ☐ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Recovering Possession
- ☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
- ☒ Dissolution/Divorce/Separate Maintenance
- ☒ Family Violence Petition
- ☒ Paternity/ Legitimation
- ☒ Support – IV-D
- ☒ Support – Private (non-IV-D)
- ☒ Other Domestic Relations

Post-Judgment - Check One Case Type

☐ Contempt
☐ Non-payment of child support,
medical support, or alimony
☐ Modification
☐ Other/Administrative

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. _____
Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

FILED
2/7/2018 11:10 AM
Tammy M. Howard, Clerk
Superior & State Court
Douglas County, GA
18SV00047

**IN THE STATE COURT OF DOUGLAS COUNTY
STATE OF GEORGIA**

DIANNE WRIGHT,

Plaintiff,

vs.

WAL-MART STORES, INC.,

Defendant.

Civil Action File No. 18SV00047

COMPLAINT

COMES NOW, DIANNE WRIGHT, Plaintiff in the above-styled action, and hereby states her complaint against the Defendant as follows:

PARTIES

1.

Plaintiff DIANNE WRIGHT is a resident of Lithia Springs, Douglas County, Georgia.

2.

Defendant WAL-MART STORES, INC. ("Defendant") is a foreign, for-profit, Delaware corporation licensed to do business in the State of Georgia and transacts business in Lithia Springs, Douglas County, Georgia, and therefore, is subject to the jurisdiction of this Court. The Defendant can be served through its registered agent, C T Corporation System, 289 S Culver St, Gwinnett County, Lawrenceville, Georgia 30046-4805.

3.

At all times relevant to this complaint, Defendant was engaged in the retail business, and in furtherance of that business, kept and maintained a place of business known as Walmart Supercenter which, upon information and belief, is located at 1100 Thorton Road, Lithia Springs,

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18SV00047

Georgia 30122, wherein it operated a retail store and offered to the general public retail items for sale. The general public was specifically invited to enter said store for the purchase of retail items.

4.

By virtue of the facts alleged herein, venue of this action is properly laid in this Court, pursuant to Article VI, Section II, Paragraph VI of the 1983 Constitution of the State of Georgia and O.C.G.A. § 14-2-510(a) and (b)(4).

STATEMENT OF FACTS

5.

On or about November 6th, 2016, Plaintiff entered Defendant's Walmart Supercenter store which, upon information and belief, is located at 1100 Thorton Road, Lithia Springs, Georgia 30122.

6.

Plaintiff entered Defendant's store as a customer to shop and purchase certain merchandise, and therefore, Plaintiff occupied the status of business invitees while on the premises of Defendant.

7.

During the course of Plaintiff Wright's shopping in Defendant's store, Plaintiff was walking through the aisle where bottled water is located.

8.

As Plaintiff was walking in this particular area, Plaintiff suddenly and without warning, slipped and violently fell to the surface of the floor with great force, causing serious injury to her person.

9.

Unbeknownst to Plaintiff, prior to her fall, there existed on the floor where she fell a

-2-

slippery, foreign substance or liquid which caused her to fall to the floor.

10.

The existence of this foreign substance or liquid on the floor in Defendant's store created a dangerous and hazardous condition of which Defendant, by and through its employees, had actual or constructive knowledge, and which could not have become known to Plaintiff in the exercise of reasonable care and diligence on her part.

11.

Defendant Wal-Mart Stores, by and through its employees, had actual knowledge of the existence of the dangerous and hazardous condition on the floor which caused Plaintiff to fall and resulted in serious injuries to her. Even though Defendant possessed such knowledge, it, by and through its employees, took no steps or actions, to either warn its customers and patrons of the existence of such a condition, or to timely remove the foreign substance or liquid from the floor.

12.

Additionally, as alleged herein above, Defendant Wal-Mart Stores had constructive notice and knowledge of the presence of the dangerous and hazardous condition by virtue of attendant facts and circumstances which existed at the time of this occurrence complained of herein. Defendant negligently failed to inspect the premises and keep them safe, and negligently failed to have in place sufficient policies, practices and procedures, which, in the exercise of ordinary care and diligence, would have prevented the occurrence of which Plaintiff complains.

13.

Defendant was negligent by failing to train and instruct its employees in the proper practices and procedures for inspecting and maintaining the floors in the store where customers, like Plaintiff, would walk or use while shopping in order to keep the floors safe, passable and free of

dangerous foreign substances and liquids.

14.

Defendant Wal-Mart Stores was otherwise negligent.

15.

As a direct and proximate result of the negligence of the Defendant, its agents, servants and/or employees, Plaintiff suffered serious physical pain and mental anguish and serious bodily injuries. As a proximate result of the negligence of the Defendant, its agents and employees, Plaintiff has experienced pain and suffering and will continue to experience pain and suffering and mental anguish in the future. Plaintiff shows that the direct and proximate cause of the injuries and damages complained of herein were due to the acts and omissions of Defendant as set forth herein. Plaintiff is entitled to recover damages from Defendant Wal-Mart Stores for past, present and future pain and suffering and medical expenses.

16.

Plaintiff Wright has incurred medical expenses with several medical providers, including, but not limited to: Barbour Orthopaedics & Sports Medicine, Eastside Medical Center, Benchmark Physical Therapy, Perimeter Surgical Center, American Health Imaging, Summit Health Clinic, LLC, Electronic Waveform Lab, Inc., and Med South Surgical, Inc. Plaintiff is still treating as a result of the incident and will incur additional medical expenses for her care and treatment in the future. Plaintiff is entitled to recover from Defendant Wal-Mart Stores for past and future medical expenses in an amount to be proven at trial.

17.

Plaintiff is entitled to recover from Defendant in an amount to be determined by the jury at trial for past, present and future pain and suffering in an amount to be proven at trial.

-4-

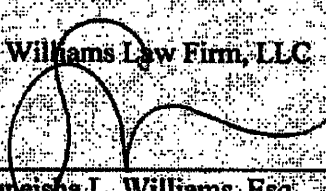
18SV00047

WHEREFORE, Plaintiff DIANNE WRIGHT prays as follows:

- (a) That process issue and Defendant be served as provided by law;
- (b) That Plaintiff has judgment against Defendant in an amount to be determined by the enlightened conscience of a jury at trial for past, present, and future pain and suffering;
- (c) That Plaintiff has judgment against Defendant in an amount to be determined by the enlightened conscience of a jury at trial for past, present, and future medical expenses and for the impairment of Plaintiff's body;
- (d) That Plaintiff has judgment against Defendant, in an amount to be determined by the enlightened conscience of a jury at trial, for past and future lost wages, and reduced earning capacity;
- (e) That Plaintiff has a trial by jury for all issues so triable;
- (f) That Plaintiff be awarded reasonable attorney's fees; and
- (g) That Plaintiff has such other and further relief as this Court deems just, equitable, and proper.

Respectfully submitted this 7th day of February, 2018.

S. Williams Law Firm, LLC



Suneisha L. Williams, Esq.
GA Bar No. 417632
Attorney for Plaintiff
swilliams@swlflc.com

P.O. Box 52421
Atlanta, GA 30355
Phone: (404) 490-3740
Fax: (844) 501-0923

IN THE STATE COURT OF DOUGLAS COUNTY
STATE OF GEORGIA

DIANNE WRIGHT

Civil Action File No.
18SV00047

Plaintiff,

v.

WAL-MART STORES, INC.,

Defendant.

_____ /

ANSWER OF DEFENDANT

COMES NOW, Defendant WAL-MART STORES, INC., (erroneously named)

and makes this Answer to Plaintiff's Complaint as follows:

FIRST DEFENSE

Wal-Mart Stores, Inc. is not a proper party.

SECOND DEFENSE

_____ Venue is improper for Wal-Mart Stores, Inc.

THIRD DEFENSE

Jurisdiction is improper for Wal-Mart Stores, Inc.

FOURTH DEFENSE

Plaintiff has failed to join an indispensable party, Wal-Mart Stores East, LP.

FIFTH DEFENSE

Plaintiff's Complaint fails to state a claim against Defendant upon which relief can be granted.

SIXTH DEFENSE

Plaintiff's alleged damages, if any, were directly and proximately caused by Plaintiff's own contributory negligence and failure to exercise ordinary care.

SEVENTH DEFENSE

Plaintiff was not in the exercise of ordinary care for her own safety in the premises, and by the exercise of ordinary care could have avoided any injury to herself; and on account thereof, Plaintiff is not entitled to recover from Defendant.

EIGHTH DEFENSE

Defendant denies that it was negligent in any manner whatsoever or that any negligent act or omission on its part caused or contributed to any injury or damage alleged to have been sustained by Plaintiff.

NINTH DEFENSE

Plaintiff assumed the risk of any hazard that was presented and is thereby barred from recovering against Defendant.

TENTH DEFENSE

Defendant responds to the enumerated paragraphs of Plaintiff's Complaint as follows:

1.

Defendant lacks sufficient knowledge and information to either admit or deny the allegations contained in paragraph 1 of Plaintiff's Complaint.

2.

Defendant denies the allegations contained in paragraph 2 of the Plaintiff's Complaint, and shows that Wal-Mart Stores, Inc. is not the proper Defendant.

3.

Defendant denies the allegations contained in paragraph 3 of the Plaintiff's Complaint.

4.

Defendant denies the allegations contained in paragraph 4 of the Plaintiff's Complaint.

5.

Defendant denies the allegations contained in paragraph 5 of the Plaintiff's Complaint.

6.

Defendant denies the allegations contained in paragraph 6 of the Plaintiff's Complaint.

7.

Defendant denies the allegations contained in paragraph 7 of the Plaintiff's Complaint.

8.

Defendant denies the allegations contained in paragraph 8 of the Plaintiff's Complaint.

9.

Defendant denies the allegations contained in paragraph 9 of the Plaintiff's Complaint.

10.

Defendant denies the allegations contained in paragraph 10 of the Plaintiff's Complaint.

11.

Defendant denies the allegations contained in paragraph 11 of the Plaintiff's Complaint.

12.

Defendant denies the allegations contained in paragraph 12 of the Plaintiff's Complaint.

13.

Defendant denies the allegations contained in paragraph 13 of the Plaintiff's Complaint.

14.

Defendant denies the allegations contained in paragraph 14 of the Plaintiff's Complaint.

15.

Defendant denies the allegations contained in paragraph 15 of the Plaintiff's Complaint.

16.

Defendant denies the allegations contained in paragraph 16 of the Plaintiff's Complaint.

17.

Defendant denies the allegations contained in paragraph 17 of the Plaintiff's Complaint.

18.

All other allegations contained in the Complaint which are not specifically responded to herein, are, therefore, denied.

19.

Defendant denies Plaintiff's prayer for relief, including all subparts (a), (b), (c), (d), (e), (f), (g) thereof.

WHEREFORE, Defendant prays that Plaintiff's Complaint be dismissed with all costs cast upon the Plaintiff. DEFENDANT DEMANDS TRIAL BY A JURY OF TWELVE (12) PERSONS AS TO ALL ISSUES SO TRIABLE.

McLAIN & MERRITT, P.C.

/s/ Howard M. Lessinger
Howard M. Lessinger
Georgia Bar No. 447088

/s/ Jennie Rogers
Jennie Rogers
Georgia Bar No. 612725
Attorneys for Defendant
WAL-MART STORES, INC.

3445 Peachtree Road, N.E.
Suite 500
Atlanta GA 30326
(404) 365-4514
(404) 364-3138 (fax)
hlessinger@mmatllegal.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing ANSWER OF DEFENDANT WAL-MART STORES, INC. has this day been filed and served upon opposing counsel via Odyssey eFileGA.

This the 23rd day of February, 2018.

McLAIN & MERRITT, P.C.

/s/ Howard M. Lessinger
Howard M. Lessinger
Georgia Bar No. 447088
Attorney for Defendant
WAL-MART STORES, INC.

3445 Peachtree Road, N.E.
Suite 500
Atlanta GA 30326
(404) 365-4514
(404) 364-3138 (fax)
hlessinger@mmatllegal.com

IN THE STATE COURT OF DOUGLAS COUNTY
STATE OF GEORGIA

DIANNE WRIGHT

Civil Action File No.
18SV00047

Plaintiff,

v.

WAL-MART STORES, INC.,

Defendant.

12-PERSON JURY DEMAND

COMES NOW Defendant, WAL-MART STORES, INC. and demands a trial
by a jury of twelve (12) persons.

McLAIN & MERRITT, P.C.

/s/ Howard M. Lessinger
Howard M. Lessinger
Georgia Bar No. 447088
Attorney for Defendant
WAL-MART STORES, INC.

3445 Peachtree Road, N.E.
Suite 500
Atlanta GA 30326
(404) 365-4514
(404) 364-3138 (fax)
hlessinger@mmatllaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing 12-PERSON JURY DEMAND has this day been filed and served upon opposing counsel via Odyssey eFileGA.

This the 23rd day of February, 2018.

McLAIN & MERRITT, P.C.

/s/ Howard M. Lessinger

Howard M. Lessinger
Georgia Bar No. 447088
Attorney for Defendant
WAL-MART STORES, INC.

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IN THE STATE COURT OF DOUGLAS COUNTY
STATE OF GEORGIA

DIANNE WRIGHT

Civil Action File No.
18SV00047

Plaintiff,

v.

WAL-MART STORES, INC.,

Defendant.

NOTICE OF TAKING DEPOSITION

YOU ARE HEREBY notified that beginning on the 1st day of June, 2018, commencing at 11:00 a.m, at the law offices of Suneisha L. Williams, Atlanta, Georgia the deposition will be taken of Dianne Wright. Said deposition will be taken for purposes of discovery and all other purposes provided by law before an officer duly authorized to administer oaths. The deposition shall continue from day-to-day until completion. This deposition may also be videotaped by a videographer.

McLAIN & MERRITT, P.C.

/s/ Howard M. Lessinger
Howard M. Lessinger
Georgia Bar No. 447088
Attorneys for Defendant

3445 Peachtree Road, N.E., Suite 500
Atlanta GA 30326
(404) 266-9171

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing 12-PERSON JURY DEMAND has this day been filed and served upon opposing counsel via Odyssey eFileGA.

This the 23rd day of February, 2018.

McLAIN & MERRITT, P.C.

/s/ Howard M. Lessinger
Howard M. Lessinger
Georgia Bar No. 447088
Attorney for Defendant
WAL-MART STORES, INC.

3445 Peachtree Road, N.E.
Suite 500
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hlessinger@mmatllaw.com

IN THE STATE COURT OF DOUGLAS COUNTY
STATE OF GEORGIA

DIANNE WRIGHT

Civil Action File No.
18SV00047

Plaintiff,

v.

WAL-MART STORES, INC.,

Defendant.

_____ /

CERTIFICATE REGARDING DISCOVERY

Pursuant to Uniform State Court Rule 5.2, as amended, the undersigned hereby certifies that the following discovery has been served upon all persons identified in the Certificate of Service attached hereto and incorporated herein by reference:

- 1) INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF; and
- 2) REQUEST FOR ADMISSIONS TO PLAINTIFF

McLAIN & MERRITT, P.C.

/s/ Howard M. Lessinger

Howard M. Lessinger

Georgia Bar No. 447088

Attorney for Defendant

WAL-MART STORES, INC.

3445 Peachtree Road, N.E., Suite 500
Atlanta GA 30326

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing CERTIFICATE REGARDING DISCOVERY has this day been filed and served upon opposing counsel via Odyssey eFileGA.

This the 23rd day of February, 2018.

McLAIN & MERRITT, P.C.

/s/ Howard M. Lessinger
Howard M. Lessinger
Georgia Bar No. 447088
Attorney for Defendant
WAL-MART STORES, INC.

3445 Peachtree Road, N.E.
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IN THE STATE COURT OF DOUGLAS COUNTY
STATE OF GEORGIA

DIANNE WRIGHT

Civil Action File No.
18SV00047

Plaintiff,

v.

WAL-MART STORES, INC.,

Defendant.

CONSENT ORDER SUBSTITUTING DEFENDANT

It appearing to the Court that Wal-Mart Stores East, LP. is the correct corporate Defendant, by consent of the parties and for good cause shown, it is hereby

ORDERED that Wal-Mart Stores East, LP. shall be substituted as a Defendant in lieu of Wal-Mart Stores, Inc. The caption shall be amended to reflect that Wal-Mart Stores East, LP. is the sole corporate Defendant. Plaintiff need not file an Amended Complaint to reflect this substitution, and Defendant need not file any further Answer.

SO ORDERED this ____ day of _____, 2018.

W. O'Neal Dettmering, Jr.
Judge, Douglas County State Court

/s/ Suneisha L. Williams
Suneisha L. Williams
Georgia Bar No. 417632
Counsel for Plaintiff
PO Box 52421
Atlanta, GA 30355
(404) 490-3740
swilliams@swlflc.com

/s/ Howard M. Lessinger
Howard M. Lessinger
Georgia Bar No. 447088
Counsel for Defendant
3445 Peachtree Road, Suite 500
Atlanta, GA 30326
(404) 365-4514
hlessinger@mmatlflow.com

 ORIGINAL

18SV00047

IN THE STATE COURT OF DOUGLAS COUNTY
STATE OF GEORGIA

DIANNE WRIGHT

Plaintiff,

v.

WAL-MART STORES, INC.,

Defendant.

Civil Action File No.
18SV00047

FILED

MAR 01 2018

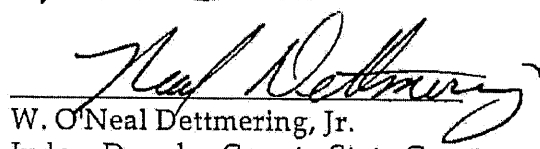
Tammy M. Howard, Clerk
Superior & State Court
Douglas County, GA

CONSENT ORDER SUBSTITUTING DEFENDANT

It appearing to the Court that Wal-Mart Stores East, LP. is the correct corporate Defendant, by consent of the parties and for good cause shown, it is hereby

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SO ORDERED this 1 day of Mar, 2018.


W. O'Neal Dettmering, Jr.
Judge, Douglas County State Court

By Designation

/s/ Suneisha L. Williams
Suneisha L. Williams
Georgia Bar No. 417632
Counsel for Plaintiff
PO Box 52421
Atlanta, GA 30355
(404) 490-3740
swilliams@swlflc.com

/s/ Howard M. Lessinger
Howard M. Lessinger
Georgia Bar No. 447088
Counsel for Defendant
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hlessinger@mmlaw.com

 received
2/27/18